



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

4WD-RCRA

APR 23 2004

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Alphonso Hall  
Owner  
International Agile Manufacturing, LLC  
P.O. Box 2989  
Statesboro, Georgia 30459

Subject: RCRA Compliance Evaluation Inspection  
EPA ID Number: GAD 065-330-151

Dear Mr. Hall:

On January 26 and 27, 2004, the United States Environmental Protection Agency (EPA), along with the Georgia Environmental Protection Division (EPD), conducted a RCRA compliance evaluation inspection at your facility located in Statesboro, Georgia, in order to determine it's compliance status with RCRA.

Enclosed is the EPA RCRA Site Inspection Report which indicates that violations of RCRA were discovered. A copy of this report has also been forwarded to EPD.

If you have any questions, please contact Daryl Himes at (404) 562-8614.

Sincerely yours,

Jeffrey T. Pallas, Chief  
South Enforcement and Compliance  
Section  
RCRA Enforcement and Compliance  
Branch

Enclosure

cc: Ms. Jennifer Kaduck, EPD  
Ms. Terri Crosby, EPD

Mr. Thomas Fish  
President  
Anvil International  
11021 Clito Road W  
Statesboro, GA 30461

Ms. Karen Bruntrager  
General Counsel, Esq.  
Anvil International  
11021 Clito Road W  
Statesboro, GA 30461

## RCRA COMPLIANCE INSPECTION REPORT

1) Inspector and Author of Report

Daryl R. Himes  
Environmental Engineer

2) Facility Information

International Agile Manufacturing, LLC  
11021 Clito Road  
Statesboro, Georgia 30461

EPA I.D. Number: GAD 065-330-151

3) Responsible Official

Alphonso Hall  
Owner

4) Inspection Participants

Daryl R. Himes, EPA  
Terri Crosby, GA EPD  
Deadre Whittington, GA EPD  
David Lyle, GA EPD Coastal District  
Alphonso Hall, International Agile Manufacturing  
Caleb Johnson, International Agile Manufacturing  
Steve James, James Engineering

5) Dates of Inspection

January 26 & 27, 2004

6) Applicable Regulations

Title 40 Code of Federal Regulations (CFR) Parts 260  
through 270.

Chapter 391-3-11 of the Georgia Hazardous Waste Management Act, adopted and  
incorporated by reference  
Parts 260 - 266, 268, & 270.

7) Purpose of Inspection

To conduct an unannounced compliance evaluation inspection (CEI) to determine the facility's compliance status with the applicable RCRA regulations.

8) Facility Description

IAM was a grey iron foundry that produced iron castings from scrap steel, iron, and various alloys. At the time of this inspection, the facility was not in operation. The facility had not been in operation since September of 2003. During its operation, which began in the 1970's, the facility operated as follows:

Raw Material Handling

Scrap steel, iron, and various alloys were brought to the facility via rail. The casting materials used by the facility such as core sand, binder, and chemical additives were also brought to the facility via railcar and were conveyed pneumatically to storage silos.

Metal Melting

The incoming mixtures of scrap metals and alloys were melted in phases by heaters which included preheating devices for driving off moisture followed by melting in induction furnaces. At the time of its shutdown, International Agile Manufacturing was utilizing Brown Bavorio Corporation induction furnaces. Three IT-10 models were being used on the North End, four IT-9 models were being used on the South End. Inside the induction furnace, as the temperature of the scrap and alloys was raised to a melting temperature for the steel and iron, dust from the heating process was released.

During its operation the facility installed a scrubber system to minimize air emission from facility casting operations and later, in the early 1990's, baghouses for each of its seven induction furnaces. The baghouses are located on the west side of the facility's main building. Each of the seven furnaces operated with its own baghouse.

During the facility's operation, baghouse dust collected within any of the facility's baghouses was combined with sludge generated from the treatment of the facility's scrubber waters. Sampling data collected from sampling the facility's baghouse dust found the material to be characteristically hazardous for cadmium (D006) and lead (D008). The facility subsequently mixed the baghouse dust with the scrubber sludge and disposed of this mixture in an on-site landfill. Test results of this mixture taken during this inspection found this material to exceed the land disposal restriction standards for cadmium.

### Core Production

The facility utilized cores making lines in its production process to make castings. The facility used four different core lines during its operation. In the core production process, sand was blended with a binding agents (nonhazardous), conveyed to core machines, molded to shape, and injected with catalyst (nonhazardous). The sand casting mixture was then conveyed to hot box molding machines where it was molded to shape and heated. No hazardous wastes were generated as a result of this operation. Solid Wastes resulting from this operation were captured by the facility's scrubber system.

### Mold Manufacturing

Four molding lines were used by the facility. In each line, virgin mold sand was blended with return sand, seacoal, clay and water. The materials were then conveyed to a mold machine for shaping. In the mold machine, the cores were placed in metal mold patterns, the mold sand was deposited, and the materials were pressed into shape. Solid Wastes resulting from this operation were captured by the facility's scrubber system.

### Pouring

Molten metal was poured from a ladle into the sand molds. The molten castings then traveled through cooling tunnels and, when cool, shaken free from the mold. After shake out, the castings, molds, and cores were separated on a vibrating grid. The castings were then allowed to cool further prior to inspection. Solid Wastes resulting from this operation were captured by the facility's scrubber system.

### Finishing

Castings are finished using a shot blast machine to remove sand and surface blemishes. The castings were then machined and painted. Solid Wastes resulting from this operation were captured by the facility's scrubber system. Solid Wastes resulting from this operation were captured by the facility's scrubber system.

## 9) Findings

Upon arriving at the facility, EPA credentials were presented to the facility representatives for International Agile Manufacturing.

International Agile Manufacturing representatives stated that the facility had been closed since September of 2003. Electrical Power to the facility had been turned off except for a small area of the facility's front office. A brief discussion of the relationship which

existed between International Agile Manufacturing and the owner of the property, Anvil International, took place. The facility personnel present at the time the facility inspection began were unaware of the facility's hazardous waste management practices or where facility records were kept. The inspection team then informed the facility personnel that it was their intent to take up to ten samples in the area of its baghouses and on-site landfill.

#### West Side Baghouse Area

The inspection team proceeded through the facility with flashlights to the baghouse area which is located on the west side of the facility. Upon observing materials having been disposed on the ground in varying amounts throughout this area of the facility the inspection team decided to take samples in several areas and tanks in and about this part of the facility. The samples would be analyzed to determine if they were characteristically hazardous for metals and/or to see if they exceed land disposal restriction levels. At the time of the inspection on January 26, 2003, a hard rain was occurring causing a significant amount of waste material to wash off the asphalt pad on the west side of the building into a small creek running adjacent to a facility fence on that side of the property.

#### Sampling

Below is a list of the samples taken in the areas of the baghouses and surrounding areas and a brief description of each:

- Sample 1 - Roll-off container of spent sandlike material. (Photo 1)
- Sample 2 - Roll-off container of slag. (Photo 1)
- Sample 3 - North End of Building below baghouse near the northwest corner of building. Results for this sample found this material to be hazardous for cadmium (23 ppm) and lead (48 ppm). (Photos 2 and 3)
- Sample 4 - West side of building about midway between the north and south ends of the main facility building near a fire hydrant. Results for this sample indicate this material to be hazardous for cadmium (1.1 ppm). The lead value was found to be 1.2 ppm. (Photo 4)
- Sample 5 - Area of drain to a ditch on the other side of fence.
- Sample 6 - Heavy fines from clarifier in bin which would be disposed.
- Sample 7 - Sample from filter press tank.

As a result of these analyses and the facility's waste management practices regarding baghouse dust generated as a result of the facility's metal melting operations, the following violations exist at the International Agile Manufacturing facility:

**International Agile Manufacturing is in violation of Section 3005 of RCRA, 42 U.S.C. § 6925 for the treatment of hazardous waste baghouse dust (D006 & D008) without a permit by mixing the waste with solid waste (scrubber wastewater).**

**In addition, International Agile Manufacturing is in violation of 40 C.F.R. § 268.3(b) for the dilution of a characteristic hazardous waste baghouse dust (D006 & D008) in order to meet land disposal treatment standards.**

**International Agile Manufacturing is in violation of Section 3005 of RCRA, 42 U.S.C. § 6925 for the storage and disposal of hazardous waste (D006 & D008) in a waste pile and surrounding areas on the west side of its facility. In addition, International Agile Manufacturing is in violation of the applicable regulations in 40 C.F.R. Parts 260-270, promulgated pursuant to Section 3005 of RCRA, for the storage/disposal of a hazardous waste.**

**International Agile Manufacturing is in violation of 40 C.F.R. § 268.40(a) (Section 391-3-11-.16) for the land disposal of prohibited waste on the west side of its facility.**

**International Agile Manufacturing is in violation of a condition for exemption from RCRA § 3005 given in 40 CFR § 265.31 (Section 391-3-11-.10 ), as incorporated by 40 CFR § 262.34(a)(4). The facility violated this regulation by failing to minimize the possibility of any unplanned sudden or non-sudden release on the west side of its facility by the presence of having uncontainerized hazardous waste leaving the facility boundaries during the January 26, 2004, rain event.**

The inspection team then took three samples of waste from International Agile Manufacturing's on-site landfill. The results of these samples are as follows:

Sample 8 - Inlet to run-off pond in landfill area. (Photo 7)

Sample 9 - Landfill disposal pile area. (Photo 8)

Sample 10 - Landfill disposal pile area. (Cadmium 0.34 TCLP) (Photo 8)

One of the samples taken, Sample 10, had a TCLP cadmium level of 0.34 ppm. The regulatory level for the land disposal of cadmium in accordance with the land disposal restriction standards is 0.11 ppm.

International Agile Manufacturing is in violation of 40 C.F.R. § 268.40(a) (Section 391-3-11-16) for the land disposal of prohibited waste. International Agile Manufacturing land disposed a hazardous waste which was not treated to the applicable treatment standards.

#### Hazardous Waste Storage Area

This area consisted of a roofed, three sided, metal structure on a concrete pad. At the time of the inspection, fourteen (14) bags of hazardous waste were contained within the building. Ten of the cubic yard bags contained spent baghouse bags. Four of the bags contained baghouse dust. (Photo 9). All of the bags were being stored on top of wooden pallets. Each of the bags were labeled with the words "Hazardous Waste." The bags were not labeled with accumulation start dates. **International Agile Manufacturing has failed to adhere to a condition for exemption from RCRA § 3005 given in 40 CFR § 262.34(a)(2) (Section 391-3-11-.08 (a)).** This regulation requires hazardous waste generators to clearly mark each hazardous waste container with the accumulation start date. As such, the facility is illegally storing hazardous wastes in violation of RCRA § 3005. **International Agile Manufacturing has failed to adhere to a condition for exemption from RCRA § 3005 given in 40 CFR § 265.174, as incorporated by 40 CFR § 262.34(a)(1)(i).** This regulation requires the facility to inspect containers of accumulated hazardous waste for leaks and deterioration on a weekly basis. As such, the facility is illegally storing wastes in violation of RCRA § 3005.

10) Signed




Daryl R. Himes

Inspector and Author of Report

3/19/04

Date

11) Concurrence and Approval

  
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Jeffrey T. Pallas, Chief  
South Enforcement and Compliance Section  
RCRA Enforcement and Compliance Branch

4-27-04  
Date

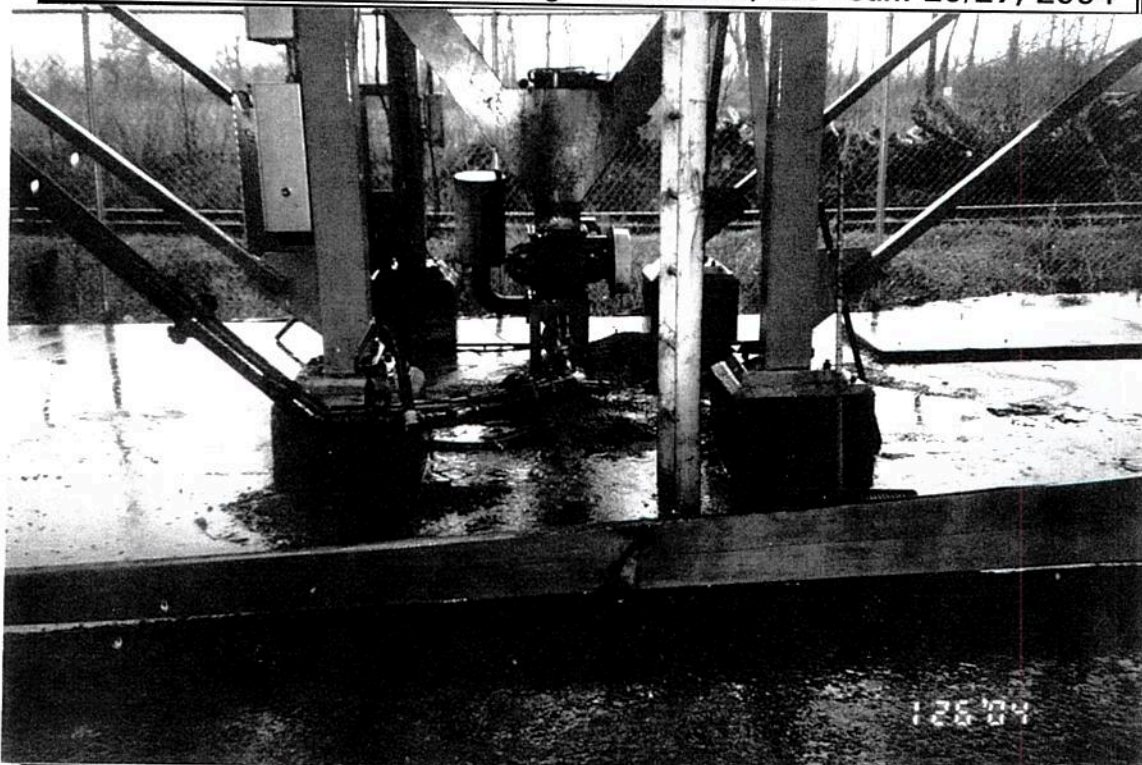
## PHOTOGRAPHS



**Photograph #1**

Northwest corner of building - roll-off storage area.

**International Agyle Manufacturing - Statesboro, GA - Jan. 26/27, 2004**



**Photograph #2**

Baghouse dust sampled beneath northernmost baghouse (Sample 3).

**International Agyle Manufacturing - Statesboro, GA - Jan. 26/27, 2004**



**Photograph #3**

Baghouse dust sampled beneath northernmost baghouse (Sample 3).  
**International Agyle Manufacturing - Statesboro, GA - Jan. 26/27, 2004**



**Photograph #4**

Sampling point location near hydrant (Sample 4).  
**International Agyle Manufacturing - Statesboro, GA - Jan. 26/27, 2004**



**Photograph #5**  
 Sampling point location near hydrant (Sample 4).  
**International Agyle Manufacturing - Statesboro, GA - Jan. 26/27, 2004**



**Photograph #6**  
 Southward view of material on ground on west side of building to south of sample 4.  
**International Agyle Manufacturing - Statesboro, GA - Jan. 26/27, 2004**



**Photograph #7**

Inlet to run-off pond in landfill area.

**International Agyle Manufacturing - Statesboro, GA - Jan. 26/27, 2004**



**Photograph #8**

Landfill disposal pile area.

**International Agyle Manufacturing - Statesboro, GA - Jan. 26/27, 2004**



**Photograph #9**

Hazardous waste container storage area.

**International Agyle Manufacturing - Statesboro, GA - Jan. 26/27, 2004**